Kameron Sam
District Ranger
Barlow Ranger District
780 Court St, Dufur, OR 97021

September 25, 2019

RE: Wasco County Forest Collaborative Comment Letter

Dear Ranger Sam,

Please accept this letter on behalf of the Wasco County Forest Collaborative.

The Wasco County Forest Collaborative membership recognizes that the Mount Hood National Forest and Barlow Ranger District have pursued the use of the Insect and Disease Categorical Exclusion because 1) the collaborative has demonstrated strong working relationships and a capacity to develop project-level agreements, and 2) the landscapes proposed for treatment have similar ecological characteristics as the Rocky Restoration Project.

Healthy Forest Restoration Act (HFRA) rules about using Categorical Exclusions for insect and disease projects require that projects must:

- Maximize old growth and large trees to the extent the trees promote stands that are resilient to insect and disease threats;
- Consider the best available scientific information; and
- Be developed and implemented through a collaborative process that: includes multiple interested persons representing diverse interests and is transparent and non-exclusive.

The collaborative process to develop the South Pen and Pollywog projects began in June 2019 and comments to the Forest Service were requested to be submitted no later than September 25, 2019. Some collaborative members do not feel this timeline has allowed for meaningful engagement with the collaborative group, especially as the project was planned during summer months. In the future, providing ample time for collaborative engagement prior to scoping would be appreciated. Scheduling conflicts and busy summer schedules have made it difficult for all collaborative members and agency staff to participate in meetings and field tours.

The comments provided below refer to the South Pen and Pollywog projects. Comments are organized by topical areas and generally apply to both planning areas. Specific reference to individual planning areas is included to highlight areas of specific concern and collaborative agreement.

Role of Native Insects and Diseases
Forest collaborative members appreciate that the Forest Service is working to implement active management in the areas most affected by insect and disease outbreaks, and at the same time not trying to eliminate all insects and diseases from the landscape. The insects and diseases currently present in South Pen and Pollywog are native to the Pacific Northwest. They play an important role in creating heterogeneity across the landscape and often produce high quality wildlife habitat. The increased presence of insects and diseases is a natural response to a century of fire suppression, past management activity and overstocking, and drought.

Collaborative members would like to know what science the Forest Service is relying on in pursuing use of the Insect and Disease CEs in South Pen and Pollywog. Based on a review of the literature by collaborative members there does not appear to be scientific consensus on the effectiveness of thinning and prescribed burning to reduce the size and overall extent of insect outbreaks. Further, there is not site-specific research to the east zone of the Mount Hood National Forest on this topic. Collaborative members would like to see Forest Service conduct, support, and/or invest in project development, implementation and monitoring to address the following key questions:

- What was the historical extent of western pine beetle, mountain pine beetle, and fir engraver on the east zone of the Mount Hood? How has that changed as a result of fire exclusion and climate change?
- How does thinning and prescribed burning influence the rate of spread of insect and disease populations in ponderosa pine and dry-mixed conifer stands on the east zone of the Mount Hood?
- How does thinning and prescribed burning influence the overall extent of insect outbreaks across the landscape?

Plantation Thinning
There is collaborative support to reduce densities in old plantations. Treatments should support increased species diversity and heterogeneity, reduce risk of future insect and disease outbreaks, and improve wildlife habitat.

Non-Plantation Stands
Approximately half of the Pollywog planning area is in previously un-logged stands that range from pine-oak habitat to dry mixed-conifer. Many of the un-logged stands in Pollywog have been heavily impacted by fire suppression and drought. Collaborative members would like to further discuss proposed treatments in these stands including potential prescriptions and desired future conditions of the stands before providing any recommendations.

Northern Spotted Owl Habitat
Many of the un-treated stands in Pollywog are currently suitable habitat for the Northern Spotted Owl (NSO). Collaborative members discussed the sustainability of these stands to future disturbance events on the August 23, 2019 field tour. Given the current condition of the stands there was recognition among collaborative members that these areas may not continue to provide suitable habitat in the future. Any mechanical treatments in these areas should

promote the maintenance and development of suitable NSO habitat into the future. There is support to achieve this goal by thinning from below and maintaining adequate canopy density sufficient to prevent loss of suitable habitat.

It is not clear if there is designated or other types of NSO habitat in the planning areas. Collaborative members would like more information about wildlife habitat in the planning area. Designated NSO critical habitat is an extraordinary circumstance that may warrant further analysis and environmental review.

Protection of Large Trees and Old Growth Characteristics
HFRA requires that treatments protect large trees. Collaborative members are interested in understanding how the Forest Service will meet this requirement. Collaborative members would like to see clear project design criteria or protection measures put in place to protect large trees.

Prescribed Burning
Collaborative members recognize that mechanical fuels treatments will be required before the Forest Service re-introduces fire to these planning areas. There is collaborative support for re-introduction of prescribed fire in the planning areas following mechanical treatment.

Proposed treatments in the Pollywog project are immediately adjacent to The Dalles municipal watershed and The Dalles Phase 1 fuels reduction efforts along the road. Mechanical treatments to reduce densities in Pollywog are likely to create conditions to allow for re-introduction of fire within Pollywog and adjacent roadside fuels treatments. Collaborative members are interested in working with the Forest Service and The Dalles to ensure the prescribed burning treatments are implemented. Implementation will help protect water quality and reduce risk of uncharacteristically large patches of high severity wildfire in pine-oak habitat and dry mixed-conifer forest types.

Maintenance treatments and on-going re-introduction of fire will be required to ensure that these treatments remain effective in the long run. The collaborative would like the Forest Service to develop landscape burn plans and maintenance treatments.

Pine-Oak Habitat
There is collaborative support for restoration of pine-oak habitat. Treatments should promote development of habitat for key indicator species including deer and elk, western grey squirrel, and Lewis' woodpecker.

Cross-Boundary Treatments
South Pen and Pollywog project areas are interspersed with ODF&W managed lands and there is an interest in supporting cross-boundary restoration treatments.

Planting
If re-planting occurs in the planning areas following the re-introduction of prescribed fire the collaborative would like to see planting at low density and with fire tolerant species like ponderosa pine. Re-planting has created density issues in the past and is often an unnecessary cost given the plentiful seed available on site to support natural regeneration.

Root Rot
During the collaborative field tour on August 23, 2019 there were pockets of root rot observed by Forest Service specialists and collaborative members. Root rot may be spread through use of ground-based equipment and soil disturbance. Collaborative members would like to know how areas affected by root rot will be treated and what mitigation measures will be put in place to reduce risk of further spread. Forest Service specialists shared that "painting stumps" with a special sealant can reduce risk of spread of root rot. Collaborative members are interested in better understanding the costs associated with this approach.

Project Implementation
Collaborative members support the use of stewardship contracting to 1) provide preference for local contractors and workers, 2) exchange of goods for services to accomplish restoration goals on-site, and 3) generate retained receipts to support additional restoration efforts on other parts of the forest. Stewardship contracting may be particularly important given that majority of the mechanical work in South Pen and Pollywog is non-commercial. Collaborative members also recognize the importance of timber sales to provide revenue for county government, roads and schools.

Continued Collaboration and Implementation Monitoring
The Wasco County Forest Collaborative is one of a number of stakeholders named in the June 28, 2019 letter to the collaborative regarding the Insect and Disease projects. The other stakeholders identified in the letter are appointed members of the collaborative or have participated in collaborative field tours. Forest collaborative members would appreciate the opportunity to continue to coordinate discussions regarding the projects in a way that fosters shared learning among all stakeholders. For example, by ensuring that representatives from The Dalles are invited to future collaborative meetings with the Forest Service regarding the proposed Insect and Disease CE projects.

The collaborative would like to continue to engage throughout project design and implementation. An important part of the collaborative process is shared learning through implementation and effectiveness monitoring. As this is the first time the Mt. Hood National Forest has categorically excluded projects of this scale from the NEPA process, the collaborative members are very interested in understanding what the next steps are for project development. As the HFRA requires projects relying on the Insect & Disease CE to be developed and implemented by a diverse collaborative group, we want to ensure that our participation in this process is well-informed and robust.

We look forward to discussing your responses to the questions posed in this comment and working with you to better the health of the forest.

Collaborative Members
The following individuals were appointed by the Wasco County Board of Commissioners to represent diverse interests at the collaborative table.

Tribal – Bob Sjolund, Warm Springs Tribe
Community Wildfire Protection – Kristin Dodd, Oregon Department of Forestry
State Agency – Jeremy Thompson, Oregon Department of Fish and Wildlife
Private Landowner – Larry Magill, Wamic
Water Resources – Pat Davis, White River Watershed Council
Recreation and Tourism – Harvey Long, OMAC
Local Government – Ryan Bessette, Wasco County Soil and Water Conservation District
Environmental – Brenna Bell, Bark
Forest Products – Jeremy Grose, SDS Lumber Co.
At-Large – Rich Thurman, Retired Wildlife Biologist
At-Large – John Nelson, School District 21 Board Member

Thank you for your careful consideration of these collaborative agreements. If you have any questions please contact Andrew Spaeth at wascoforest@gmail.com or by calling 541.288.4107.

Sincerely,

Andrew Spaeth, Facilitator
Wasco County Forest Collaborative